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Attorneys for Defendant UMG RECORDINGS, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RICK JAMES, by and through THE JAMES  
AMBROSE JOHNSON, JR. 1999 TRUST, his  
successor in interest, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

UMG RECORDINGS, INC., a Delaware  
corporation,

Defendant.

CASE NO. CV11-01613 SI

CASE NO. CV11-02431 SI

CASE NO. CV11-05321-SI

CASE NO. CV12-01289-JCS

CASE NO. CV12-01305-SI

**STIPULATION TO CONSOLIDATE CASES**

ROB ZOMBIE, a/k/a Robert Wolfgang  
Zombie, f/k/a Robert Cummings; WHITE  
ZOMBIE, a general partnership;  
WHITESNAKE, a doing business as  
designation of David Coverdale, by and for  
WHITESNAKE PRODUCTIONS  
(OVERSEAS) LIMITED; and DAVE MASON,  
individually and on behalf of all others  
similarly situated,

Plaintiff

v.

1 UMG RECORDINGS, INC., a Delaware  
2 corporation,

3 Defendant.

4  
5 CARLTON DOUGLAS RIDENHOUR, d/b/a  
6 "CHUCK D", INDIVIDUALLY AND AS A  
7 MEMBER OF "PUBLIC ENEMY", ON  
8 BEHALF OF HIMSELF AND ALL OTHERS  
9 SIMILARLY SITUATED,

10 Plaintiff,

11 v.

12 UMG RECORDINGS, INC., a Delaware  
13 corporation,

14 Defendant.

15 OTIS WILLIAMS, RON TYSON, jointly d/b/a  
16 "THE TEMPTATIONS," on behalf of  
17 themselves and all others similarly situated,

18 Plaintiff,

19 v.

20 UMG RECORDINGS, INC., a Delaware  
21 corporation,

22 Defendant.

23 OTIS ROBERT HARRIS, JR., a.k.a. DAMON  
24 HARRIS, individually and on behalf of all  
25 others similarly situated,

26 Plaintiff,

27 v.

28 UMG RECORDINGS, INC., a Delaware  
corporation,

Defendant.

1 This stipulation is based on the following facts:

2 1. On March 27, 2012, this Court entered an order granting Plaintiff Otis Robert Harris,  
3 Jr. a.k.a. Damon Harris's administrative motion to relate *Harris v. UMG Recordings, Inc.*, Case No.  
4 CV12-01305-SI (the "Harris Action") with *Ridenhour v. UMG Recordings, Inc.*, Case No. CV11-  
5 05321-SI (the "Ridenhour action"), *James v. UMG Recordings, Inc.*, Case No. CV11-01613 SI (the  
6 "James Action") and *Zombie et al. v. UMG Recordings, Inc.*, Case No. CV11-02431 SI (the  
7 "Zombie Action") [Docket No. 75].

8 2. Defendant UMG Recordings, Inc. ("Defendant") is agreeable to consolidate the  
9 Harris Action and *Williams et al. v. UMG Recordings, Inc.*, Case No. CV12-01289-JCS (the  
10 "Williams Action") with the James Action, the Zombie Action and the Ridenhour Action solely for  
11 administrative convenience and for no other reason, and on that basis is willing to stipulate to  
12 consolidation, on the terms set out herein.

13 3. The parties hereby agree and stipulate that the Harris Action and the Williams Action  
14 may be consolidated for all purposes with the James Action, the Zombie Action and the Ridenhour  
15 Action, pursuant to Fed. R. Civ. P. 42(a)(2).

16 4. The parties agree and stipulate as a material condition of this stipulation that  
17 consolidation of these five actions shall not be used or considered in any manner, directly or  
18 indirectly, for any purpose unrelated to consolidation, including but not limited to in connection  
19 with any motion concerning class certification. The parties further agree that this stipulation is  
20 without prejudice to Defendant's right to move to sever the actions at such time as Defendant deems  
21 such a motion advisable, and Plaintiffs reserve the right to oppose that motion.

22 IT IS SO STIPULATED.

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DATED: April 10, 2012

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